



NEAMA Whistleblower Policy

EDIFY Movement, a 501(c)(3) **nonprofit** and its division NEAMA requires directors, officers, volunteers, independent contractors, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of NEAMA, we must practice honesty and integrity in fulfilling our responsibilities to our mission statement and community and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable all internal members to raise any serious concerns internally so that NEAMA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of NEAMA code of ethics or suspected violations of law or regulations that govern NEAMA operations.

No Retaliation

It is contrary to the values of NEAMA for anyone to retaliate against any board member, officer, employee, independent contractor, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, withholding pertinent information, manipulation, self dealing, purposely hidden conflicts/benefits of interest, exploitation, commodification, objectification, negligence, misrepresentation, gaslighting, emotional abuse, financial abuse, abuse of power, or suspected violation of any regulation governing the operations of NEAMA. An employee or person representing NEAMA who retaliates, or purposely tries to cause harm against someone who has reported a violation in good faith is subject to discipline up to and including termination of their role in the organization through a board vote.

Reporting Procedure

NEAMA has an open door policy and suggests that members share their questions, concerns, suggestions or complaints regarding serious violations, to the assigned Whistleblower Compliance Officers on the Board of Directors, Stevie McKim at stevie@neamacares.org and Patricia Sylvester at misstriche@neamacares.org. If you are not comfortable speaking with either of these Board of Directors, or you are not satisfied with their response, you are encouraged to speak with another board member of your choice. NEAMA members are required to report complaints or concerns about suspected ethical and legal violations in writing to the NEAMA Board of Directors Executive Team, who has the responsibility to investigate all reported complaints.

Whistleblower Compliance Officers, Stevie McKim and Patricia Sylvester are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Whistleblower Compliance Officers will work together to advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer Sir Suavé on compliance activity relating to accounting or alleged financial improprieties.

NDA's

NEAMA recognizes a long history of evidence that NDAs may be improperly used to coerce, threaten, and bully an individual or group into silence. NEAMA vows to not allow our NDAs to scare, abuse, or silence those wishing to come forward regarding ethical concerns about individuals or the organization's internal practices. Any clause found in any Non Disclosure Agreement signed by a member of NEAMA will be superseded by the protections offered in this policy.

Accounting and Auditing Matters

The Compliance Officers shall immediately notify the Executive Team of the BOD of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant to both Whistleblower Compliance Officers Stevie McKim at stevie@neamacares.org and Patricia Sylvester at misstriche@neamacares.org. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

Whistleblower Compliance Officers will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. A 7 day period will allow an assessment of the complaint and the appropriate next steps. If the investigation warrants corrective action that will be determined by the Board of Directors Executive Team. The Board of Directors Executive Team may determine the most ethical course of action is engaging an independent party for assistance in evaluating the reported violation(s).

All parties deemed by the Board of Directors Executive Team to have any conflict of interest must be recused from this process. All members of NEAMA are afforded the opportunity to put in writing to the Whistleblower Compliance Officers why they believe any Board of Directors should not participate in the evaluation or investigation of the complaint(s).

Policy approved by:

Board of Directors Stevie McKim, Patricia Sylvester, Leslie Scott and Keanu Uchida on September 13th, 2022

Source:

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